

From: Adoptinc [adopt@adoptinc.org]

Sent: Monday, December 15, 2003 7:36 PM

To: adoptionregs@state.gov

US Department of State

Adoption Regulations

December 15, 2003

RE: Comments on Proposed Regulations to Implement the Hague Convention & IAA

To Whom It May Concern:

Please accept these comments on behalf of Adopt!inc. . These comments are in addition to the comments submitted by the Joint Council on International Children Services, with which our agency agrees.

There are several concerns we have with the proposed regulations that will govern agencies working in international adoptions. First and foremost, is the belief that several of the regulations go above and **beyond statutory authority** and are in fact, in excess of what is practical and legitimate.

The first section I would like to address is 96.33 (h) with regard to the risk and liability insurance, as is also presented in 96.39 (d), 96.45 and 96.46. The requirement that agencies have 1 million dollars in coverage per incidence is highly excessive and promotes litigation. It is also impractical because liability insurance for agencies is almost impossible to obtain. Our agency recently received a quote of almost \$10,000 per year for liability insurance in this amount.... for an agency with a budget less than \$150,000! In 7 years of service we have NEVER had any claims.

This is likely to force many agencies out of business.

It is our opinion that the requirement that adoption homestudy workers have a master degree is unnecessarily restrictive 96.37 (f). I have completed adoptive parent home studies for 7 years - mostly for international adoption. My bachelor degree is in social work and I have 25 years of experience in the social work field - 9 years specifically in the adoption field. Further, my master degree is in Rehabilitation Administration and Services. Finally, I'm an adoptive parent of two.....I'm not qualified because I do not have a master degree in social work?????? I respectfully beg to differ with you!

There is also the issue of accrediting bodies. It is our concern that only one or two accrediting bodies will be available, practically resulting in a monopoly. It also appears as if the accrediting bodies will have too much power and control over agencies.

Thank you for your kind attention to this matter.

Sincerely,

12/16/2003

Brenda Riddle  
Executive Director  
Adopt!inc.  
135 Lackawanna Rd.  
Lexington, KY 40503  
(859) 276- 6249

P.S. Merry Christmas!!!